

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VEHICLE IP, LLC,

Plaintiff,

v.

AT&T MOBILITY LLC,
CELLCO PARTNERSHIP,
NETWORKS IN MOTION, INC.,
TELECOMMUNICATION SYSTEMS, INC.,
and TELENAV, INC.,

Defendants.

C.A. No. 09-1007-LPS

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

PUBLIC VERSION

**STIPULATION RE REPRESENTATIVE VERSIONS OF
ACCUSED TELENAV PRODUCTS**

WHEREAS, Plaintiff Vehicle IP, LLC filed the Complaint in the above-captioned case on December 31, 2009, accusing certain navigational systems and services made, used, sold, and/or offered for sale by Defendant Telenav, Inc. (“Telenav”) of infringing U.S. Patent No. 5,987,377 (“the ’377 Patent”);

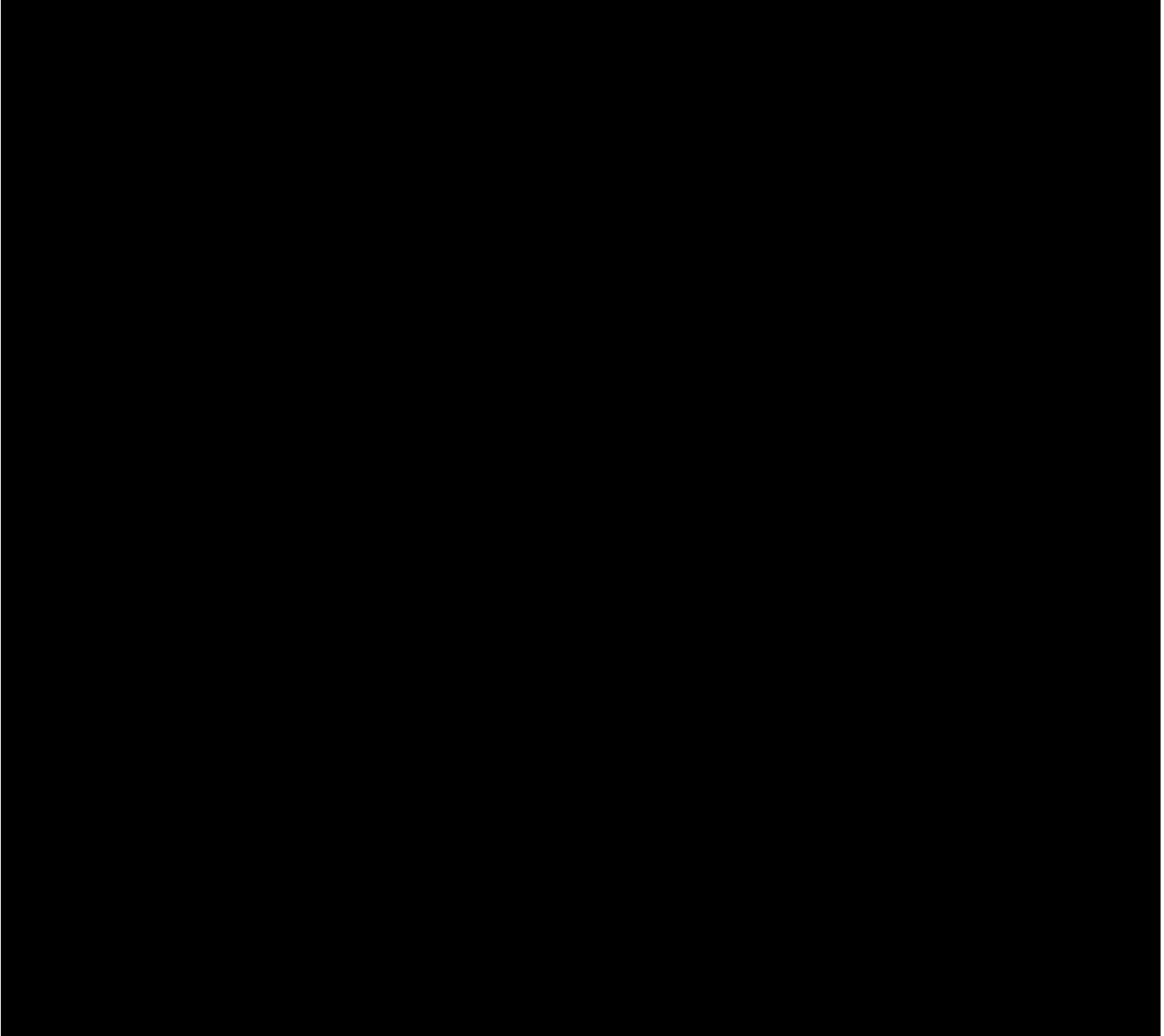
WHEREAS, Plaintiff currently accuses Telenav’s GPS Navigator, Telenav Track Premium, Scout mobile application, and Scout for Cars navigation systems (using Scout Premium) (collectively referenced as the “Accused Telenav Products”) of infringing various claims of the ’377 Patent (collectively referenced as the “Asserted Claims”);

Accused Telenav Products

WHEREAS, Telenav represents that the Accused Telenav Products were developed by Telenav, but some versions and/or releases of certain of the Accused Telenav Products have also been promoted, offered for sale, sold, and distributed by third parties (such as AT&T Mobility LLC) under various names, versions, and brands to end users;

**CONTAINS HIGHLY CONFIDENTIAL-TECHNICAL INFORMATION –
ATTORNEYS’ EYES ONLY**

WHEREAS, Telenav represents, solely for direct infringement purposes, that all of the Accused Telenav Products operate and function the same in all material respects relevant to the Asserted Claims with the following exceptions:



**CONTAINS HIGHLY CONFIDENTIAL-TECHNICAL INFORMATION –
ATTORNEYS' EYES ONLY**

WHEREAS, this stipulation does not apply to date ranges for the release and removal of features or functions that were not identified by Vehicle IP in its Infringement Contentions served on May 7, 2015, and the parties agree to discuss an amendment to this stipulation to address any such date ranges for features and functions that may be identified by the parties in discovery;

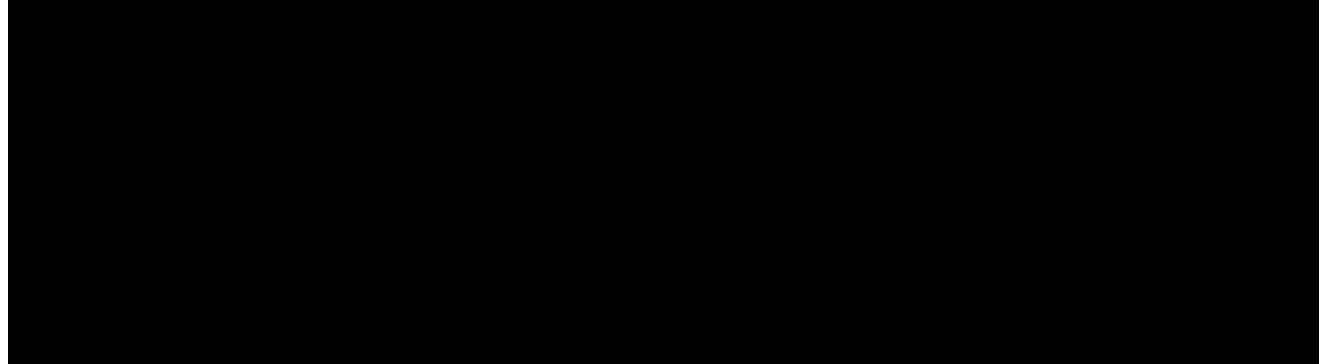
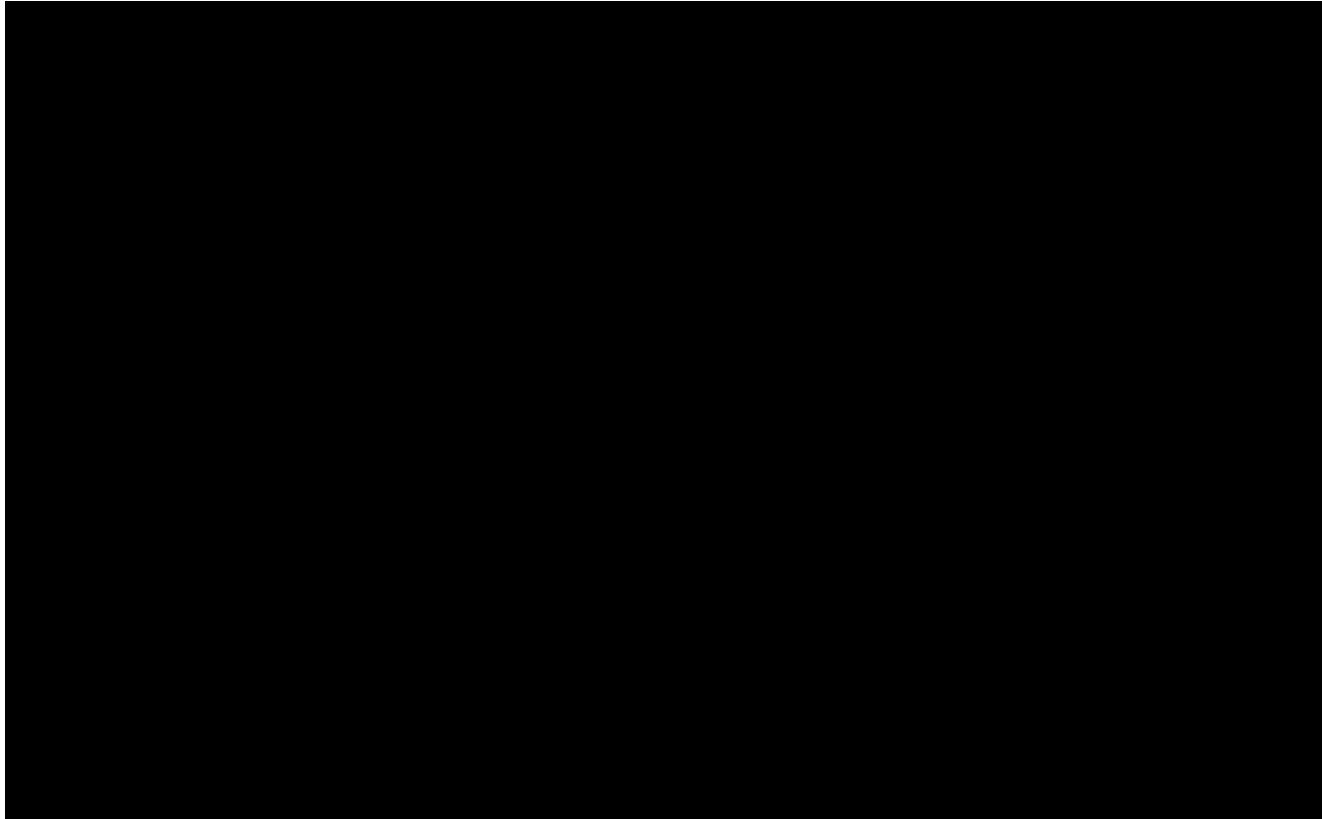
WHEREAS Telenav and Vehicle IP agree that entering this stipulation will reduce discovery time and expense and will streamline the presentation of evidence at trial;

**CONTAINS HIGHLY CONFIDENTIAL-TECHNICAL INFORMATION –
ATTORNEYS' EYES ONLY**

NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES, THROUGH THEIR UNDERSIGNED COUNSEL, AS FOLLOWS:

Accused Telenav Products

1. For the purposes of proving direct infringement or noninfringement, all of the Accused Telenav Products set forth in Appendix A operate and function the same in all material respects relevant to the Asserted Claims, with the following exceptions:



**CONTAINS HIGHLY CONFIDENTIAL-TECHNICAL INFORMATION –
ATTORNEYS' EYES ONLY**

2. This stipulation does not apply to date ranges for the release and removal of features or functions that were not identified by Vehicle IP in its Infringement Contentions served on May 7, 2015, and the parties agree to discuss an amendment to this stipulation to address any such date ranges for features and functions that may be identified by the parties in discovery.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Discovery

4.

[REDACTED]

Telenav Track Premium

5.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**CONTAINS HIGHLY CONFIDENTIAL-TECHNICAL INFORMATION –
ATTORNEYS' EYES ONLY**

Evidence of Features and Qualities of Telenav Products

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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Attorneys for Defendants Telenav, Inc. and AT&T Mobility LLC

Attorneys for Plaintiff Vehicle IP LLC

Dated: November 4, 2015

SO ORDERED on this _____ day of _____, 2015.

By the Court:

/s/

Honorable Leonard P. Stark
United States District Court Judge

**CONTAINS HIGHLY CONFIDENTIAL-TECHNICAL INFORMATION –
ATTORNEYS' EYES ONLY**

CERTIFICATE OF SERVICE¹

I hereby certify that on November 4, 2015, the attached document was served on the below-listed counsel of record for defendants AT&T Mobility LLC and TeleNav, Inc. as indicated in accordance with the parties' electronic service agreement in this action, whereby the parties have consented to service by email in accordance with Fed. R. Civ. P. 5(b)(2)(E), and have agreed that service by e-mail shall constitute personal service (as if made under Fed. R. Civ. P. 5(b)(2)(A)) for purposes of calculating due dates under Fed. R. Civ. P. 6.¹

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/s/ Martina Tyreus Hufnal
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¹ See Section 4(a) of the parties' jointly filed January 14, 2011 Proposed Rule 16 Scheduling Order (D.I. No. 45).